

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

JARROD STRINGER, et al.

Plaintiffs,

v.

ROLANDO PABLOS, in his official capacity as
Texas Secretary of State and STEVEN C.
MCCRAW, in his official capacity as Director of
the Texas Department of Public Safety

JARROD STRINGER, et al.

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as Texas
Secretary of State and STEVEN C. MCCRAW, in
his official capacity as Director of the Texas
Department of Public Safety

Defendants.

Civil Action Case No. 5:16-cv-00257-
OLG

CONSOLIDATED WITH

Civil Action Case No. 5:20-cv-00046-
OLG

**TEXAS DEMOCRATIC PARTY, DSCC, AND DCCC'S MOTION TO JOIN THE
PENDING MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs the Texas Democratic Party, DSCC, and DCCC (“Intervenors”), by and through their attorneys, hereby move the Court to join the presently pending motion for preliminary injunction filed by Plaintiffs Jarrod Stringer, Nayeli Gomez, John Harms, MOVE Texas Civic Fund, and the League of Women Voters of Texas (the “Stringer Plaintiffs”) on January 17, 2020. Intervenors join the Stringer Plaintiffs in asking this Court to issue a preliminary injunction directing Defendants to comply with the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution by providing and accepting simultaneous voter registration applications in elections for federal office from driver’s license applicants who wish to register to vote while renewing or changing the address on their driver’s license through the Department of Public Safety website.

Intervenors adopt and incorporate the arguments and authorities set forth in the Stringer Plaintiffs’ Motion for Preliminary Injunction with respect to the Stringer Plaintiffs’ Equal Protection Claim. Moreover, Intervenors expressly assert that a preliminary injunction is proper to avoid irreparable harm to their respective missions of, and efforts in, electing Democratic Party candidates to the Texas state legislature and other state and local offices, the U.S. Congress, and the U.S. Senate, as set forth in detail in the Intervenors’ Complaint (ECF No. 124-2, ¶¶ 11-13). Specifically, the Texas Democratic Party, which has millions of members and constituents from across Texas, accomplishes its purpose by of electing Democratic Party candidates to public office throughout Texas by supporting Democratic candidates through fundraising and organizing; protecting the legal rights of voters; and ensuring that all voters have a meaningful ability to cast ballots in Texas. ECF No. 124-2, ¶ 11. The DSCC works to accomplish its mission of electing Democratic Candidates to the U.S. Senate, including in Texas, by assisting state parties and making contributions and expenditures to persuade and mobilize voters to support Democratic

Senate candidates. In 2020, DSCC expects to invest millions in support of the Democratic candidate selected as the nominee to run against Republican Senator John Cornyn. *Id.* at ¶ 12. DCCC works to achieve its goal of electing Democratic candidates to the U.S. House, including in Texas, by assisting state parties and making contributions and expenditures to persuade and mobilize voters to support Democratic House candidates. *Id.* at ¶ 13. For 2020, DCCC has identified at least eight congressional districts in Texas as targeted races, in which it will expend resources to support the Democratic candidate, including specifically through expenditures on voter registration efforts. *Id.* Defendants' conduct harms the Texas Democratic Party, DCCC and DSCC in numerous ways, including by forcing them to expend and divert additional funds and resources on voter registration (to ensure that eligible citizens are not misled into believing that they have effectively registered to vote when they have not as a result of Defendant's online portal system) at the expense of their other critical efforts to elect Democrats to office in Texas and other states. *Id.* ¶¶ 11-13.

Accordingly, Intervenors respectfully move to join the Stringer Plaintiffs' Motion for a Preliminary Injunction to quickly attempt to remedy the harm being caused to them by Defendants' actions, and to require Defendants to comply with the laws and protections that are in place to ensure that every lawful Texas voter can exercise his or her right to vote.

In conjunction with this motion, Intervenors are filing a motion for summary judgment in this action.

Dated: January 28, 2020.

Respectfully submitted,

/s/ John Hardin

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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2020, I filed a copy of the foregoing Texas Democratic Party, DSCC, and DCCC's Motion to Join the Pending Motion for Preliminary Injunction with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ John Hardin

Counsel for the Intervenors